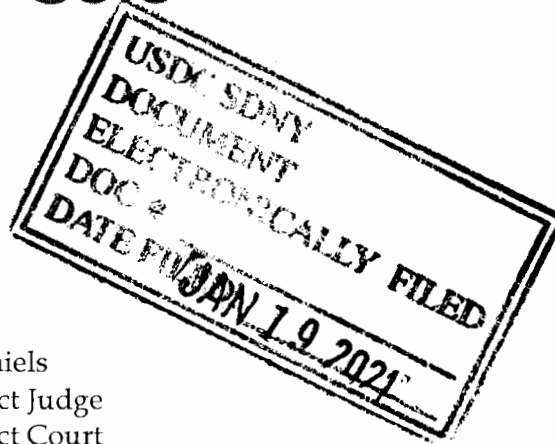


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January 15, 2021

Via ECF

Hon. George B. Daniels
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: JAN 19 2021

RE: *Diego Beekman Mut. Housing Ass'n Housing Dev. Fund Corp. v. Liberty Mut. Ins. Co., et al.*, No. 1:20-cv-10912

Dear Judge Daniels:

This firm represents Defendants Liberty Mutual Insurance Company and American Economy Insurance Company ("Defendants") in the above-referenced insurance coverage dispute. In accordance with Your Honor's Individual Rules, we submit this joint request for an extension of time for: (1) Plaintiff to file a complaint; and (2) Defendants to answer or otherwise respond to Plaintiff's complaint.

As the Court is aware, on December 1, 2020, Plaintiff commenced this action in the Supreme Court of the State of New York, Bronx County, by filing a summons with notice. Plaintiff did not serve the summons with notice, but Defendants received a copy of the summons with notice from a non-party on December 2, 2020. On December 24, 2020, Defendants timely filed a notice of removal of this action on the basis of diversity citizenship, as the action is between citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs. Defendants' deadline to answer or otherwise respond to the operative pleading, which presumably would be Plaintiff's summons with notice, was extended until January 15, 2021, by order dated January 5, 2021 (ECF No. 10).

The parties have reached an agreement to normalize the pleadings in this matter (e.g., the filing of a complaint to which an answer or pre-answer motion might be made), and respectfully request that the Court extend the deadlines to file pleadings, as follows:

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Hon. George B. Daniels
January 15, 2021
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- February 10, 2021: Deadline for Plaintiff to file its complaint;¹
- March 3, 2021: Deadline for Defendants to answer or otherwise respond to the complaint.

The parties agree that Defendant is not required to answer or otherwise respond to Plaintiff's summons with notice, as Plaintiff intends to file a complaint.

This request is made on consent. The only prior request is the aforementioned request dated December 30, 2020 (ECF No. 9). If granted, this extension will not impact any other deadlines in this case. The initial conference is scheduled for March 9, 2021.

Thank you for your consideration. Please do not hesitate to contact us, if the Court would like any additional information.

Sincerely,

/s/ Gerald P. Dwyer, Jr.

Gerald P. Dwyer, Jr.
Cara C. Vecchione
ROBINSON & COLE LLP
*Attorneys for Defendants Liberty Mutual Insurance Company
and American Economy Insurance Company*

cc: Counsel of record (via ECF)

¹ Plaintiff's counsel requires additional time to obtain certain information from his client to include in the complaint.